## **EPA Existing Power Plant CO<sub>2</sub> Reduction Hearing**

## July 29, 2014

Testimony by David J. Bufalo, P.E.

1. Carbon dioxide facts:

A. It is invisible

B. It is tasteless

C. It is non toxic

D. It constitutes 0.04 % of the atmosphere (400 parts per million)

E. It is necessary for all life on earth as it is a plant nutrient

F. We humans inhale air at a  $CO_2$  concentration of 0.04% and exhale air at a  $CO_2$  concentration of about 4.0%

G. Carbon dioxide is NOT carbon. Carbon is either graphite, or in it's pure form , a diamond.

2. Proposed new regulations of  $SO_2$  and  $NO_x$ 

A.  $NO_x$  and  $SO_2$  are currently regulated by the EPA

1.) NO<sub>x</sub> EPA standard first set in 1971

2.)  $NO_x$  EPA standards revised in January 2010. As of October 2012, "...no area of the country has been found to be out of compliance."

3.) First SO<sub>2</sub> standards set in 1971

4.) New SO<sub>2</sub> standards set in June 2010

5.) Since 1980 to date  $SO_2$  concentrations have decreased by 71%

6.) So why is the EPA touting any increased air quality benefits now? These gasses are already being adequately regulated.

3. CO<sub>2</sub> commentary

A. Nowhere in this document does the EPA state what the percentage of atmospheric  $CO_2$  should be

B. Nowhere in this document does the EPA say what the average global temperature should be

C. In earth's history,  $CO_2$  concentrations have been as high as 6,000 ppm

D. Greenhouses keep  $CO_2$  levels at 2,000 ppm to enhance plant growth

E. The US submarine fleet sets 8,000 ppm as the upper limit for air quality.

F. Human tolerance for  $CO_2$  is between 10,000 ppm and 15,000 ppm

G. The lower CO<sub>2</sub> concentration for plant survivability is 200 ppm

H. So what's the problem with a  $CO_2$  concentration at 400 ppm ?

4. EPA's assumed problems with rising CO<sub>2</sub> levels

A. Raising average global temperatures; but there has been no global warming for about the past 17 years, which is acknowledged by the IPCC

B. Extreme weather and more frequent storms, which Roger Pelkei of the University of Colorado at Boulder has debunked

C. Increased hurricane intensity and frequency, which has also been debunked by Dr. William Gray of Colorado State University.

D. Sea level rise. There has been no observed increase in the <u>rate</u> of sea level rise. Land subsidence can give the appearance of sea level rise.

5. Kickers

A. Dr. Roy Spencer estimates that mankind's contribution to  $CO_2$ levels is one molecule of  $CO_2$  for every 100,000 molecules over 5 years

B. Other countries are not cutting back on their CO<sub>2</sub> emissions

1.) Australia had just repealed its carbon tax

2.) Since the Fukushima tsunami disaster, Japan has shut down all of its nuclear plants and has switched to coal fired power plants

3.) Also since Fukushima, Germany is shutting down its nuclear plants and is now building coal fired plants. Their renewable energy sources are turning out to be too expensive.

4.) China and India are continuing to build coal fired plants.

5.) England won't agree to cutting  $CO_2$  emissions unless the rest of the world agrees to do so also

6.) Third world countries don't want their power options limited but think that the developed world owes them money.

C. California's legislators are now (June 2014) concerned about the financial impact of their  $CO_2$  cap and trade program.

6. The final nail

A. The July 19, 2014 publication of "Atmospheric Chemistry and Physics" stated that only 3.75 % (15ppm) of atmospheric  $CO_2$  in the lower atmosphere is from burning fossil fuel. This is contrary to the previous belief that fossil fuels contributed 130 ppm of  $CO_2$  to the atmosphere.

B. And finally, I calculated what the % decrease in  $CO_2$  concentration would be under this proposal. Table 12 on page 34936 states that this program would lead to a decrease of 555,000,000 metric tonnes of atmospheric  $CO_2$  by the year 2030. The weight of  $CO_2$  currently in the atmosphere is 2,800,000,000,000, metric tonnes. So, the % reduction of atmospheric carbon dioxide is 0.01982%, which really isn't very much, is it? This will reduce  $CO_2$  from 0.04% to 0.0399 %

C. This regulation will NOT do anything to reduce atmospheric  $CO_2$  concentrations. Nothing.

6. Final statement:

There has been no global warming for the past 17 years, even though atmospheric  $CO_2$  has increased. Therefore,  $CO_2$  has not been the primary cause of past global warming and there is no need to regulate it.